

FCC LPFM Comments

Interference

Our thoughts on this issue are that many full-power broadcasters signals are protected beyond the scope of their true service area.

For example, due to the terrain here in Florida, a full Class C may have a signal that could be detected by most receivers out to 90 miles, however it's doubtful if actual listening occurs past 50 miles, except in the case of those listeners in automobiles carrying the station with them on a long trip.

Another way to look at it would be to consider the Arbitron boundaries of total service area (TSA) for the market. In most cases, the FM signal passing beyond the TSA boundary is of no marketable use to the station, since its revenue is derived from sale of advertising within the survey area.

Since radio station licenses have always been awarded on a city of license basis, we believe it would be fair to establish a reasonable cut-off point for co-channel interference by LPFM out to a pre-determined distance for Class C (100 or 50 KW) stations. This would allow additional service to smaller communities and in some cases primary service for the first time, without affecting the revenues of the full-power station.

Advertising revenues

We believe the NAB's resistance to LPFM stems from the increased competition for ad dollars additional stations would create, rather than any interference issues. Obviously, the Commission will not allow LPFM stations to broadcast on main channel frequencies of existing stations.

As owner of an advertising agency, I can provide first-hand testimony to the fact that in markets with heavily centralized ownership, radio advertising costs have substantially increased, making radio unaffordable for all but the largest advertisers.

For example, in the Raleigh-Durham market, Capstar owns 5 of the top 10 stations in the market. As a result, we estimate the cost per rating point in this market to be 150% higher than in similar population markets with no substantial radio broadcast monopoly.

If the Commission allows LPFM to create additional viable stations in the market, the existing ownership monopolies would be diluted. While it remains to be seen if LPFM would have any effect on existing station revenues, we believe revenue and not interference, is the primary concern of the NAB.

Viability

We believe the Commission should consider allowing as many 1 KW stations under LPFM as possible and allowable given available frequency spectrum. New stations under this power level may be viable for certain uses, however from a traditional broadcast standard (i.e. listening at home or in businesses) at least 1 KW would be required in order for the RF to penetrate most buildings at any reasonable distance. If LPFM is to be given the chance to survive, we believe at least a percentage of the new stations should have the capacity to provide a viable signal to their limited service area.

We also believe the Commission should consider awarding a series of LPFM licenses to a single applicant on the same frequency (if otherwise available), or allow a higher power level under LPFM in certain cases, in order for the applicant to offer service to a wider area, especially in rural areas underserved by existing radio stations. While this idea might not make sense in densely-populated areas, many areas of the country still exist where the only way a radio station can be commercially viable is through reaching a group of small communities.

Qualifications

We believe the qualifications for obtaining a LPFM license should be limited to the following:

1. Is the applicant of good character
2. Does the applicant possess the funding to actually build and operate the station
3. Does the applicant currently own broadcast property

We believe those applicants who currently own broadcast property should be disqualified from applying for LPFM licenses and should not be allowed to purchase construction permits from non-broadcasters. However once a LPFM station is built and on the air for at least 1 year, we believe the owner should be free to sell it to anyone of good character who is willing and able to purchase it.

Summary

We believe LPFM is a great idea. As a former broadcaster who always dreamed of someday owning my own radio station, I can testify that due to consolidation and the resulting high cost of ownership of even a small market radio station, I have been unable to realize this dream.

We believe the tenets of LPFM should be: 1. A streamlined, simplified application process, 2. Minimal requirements for construction of the station, 3. Making frequencies available on a first-come, first awarded basis, and in the case of a tie, perhaps a coin-toss or lottery.